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**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

**UNITED STATES OF AMERICA**

v.

**PATRICK LAWRENCE WOOD**

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CASE NO.

GLS-18-2114

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**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT**

I, Augustus C. Aquino, a Special Agent (SA) with the Department of Homeland Security, Immigration and Customs Enforcement (ICE), Homeland Security Investigations (HSI), being duly sworn, depose and state that:

**INTRODUCTION**

1. I have been an agent since June 1991. As part of my daily duties as an HSI Special Agent, I investigate criminal violations relating to child exploitation and child pornography including violations pertaining to the illegal production, distribution, receipt, and possession of child pornography, in violation of 18 U.S.C. §§ 2251, 2252 and 2252A. I have gained experience through training in seminars, classes, and daily work related to conducting these types of investigations. Specifically, I have received formal training through U.S. Customs, HSI, and other agencies in the area of child pornography, pedophile behavior, collectors of other obscene material, and internet crime. I have participated in the execution of numerous search warrants, which involved child exploitation and/or child pornography offenses. Many of the child exploitation and/or child pornography search warrants resulted in the seizure of computers, cell phones, magnetic storage media for computers, other electronic media, and other items evidencing violation of federal laws, including various sections of Title 18, United States Code, Section 2252A involving child

exploitation offenses. I have also participated in the execution of numerous search warrants for online accounts, such as email accounts, online storage accounts and other online communication accounts related to child exploitation and/or child pornography. In the course of my employment with U.S Customs and HSI, I have observed and reviewed numerous examples of child pornography (as defined in 18 U.S.C. § 2256) in all forms of media including computer media and within online accounts.

2. As a federal agent, I am authorized to investigate violations of laws of the United States and I am a law enforcement officer with the authority to execute arrest and search warrants issued under the authority of the United States.

3. I am submitting this affidavit in support of a criminal complaint and arrest warrant for PATRICK LAWRENCE WOOD ("WOOD"), born in March 1986. I submit that based on the facts set forth herein, there is probable cause to believe that on or about July 18, 2018, in the District of Maryland, Defendant WOOD committed violations of Title 18, United States Code, Section 2251(a) (Production of Child Pornography), Section 2252A(a)(2) (Receipt of Child Pornography), Section 2252A(a)(5)(B) (Possession of Child Pornography). The statements in this affidavit are based in part on information provided by Montgomery County Police Department and the National Center for Missing and Exploited Children (NCMEC), as well as documents and reports prepared by others, and on my experience and background as a Special Agent of HSI. Since this affidavit is being submitted for the limited purpose of securing a criminal complaint, I have not included each and every fact known to me concerning this investigation.

#### **PROBABLE CAUSE**

4. On or about July 22, 2018, Facebook contacted NCMEC to advise that Facebook had identified a Facebook user who had requested and paid another Facebook user to create sexually

explicit images of a prepubescent male and female and send them via private message. The information Facebook sent to NCMEC advised that the Facebook account of "Patrick Wood," based in the United States, was used to entice another Facebook user, "James Lora," based in the Philippines, to create sexually explicit images of a prepubescent male and female and send them to the user of the Facebook account "Patrick Wood" via private messages. In addition, Facebook provided internet protocol (IP) addresses associated with the private messages sent from the Facebook account of "Patrick Wood" as well as an email address that was used in the registration of the "Patrick Wood" account. Facebook also provided NCMEC a copy of the images produced by the user of the Facebook account "James Lora" that had been sent to the Facebook account of "Patrick Wood" via private message.

5. As a result of the information received from Facebook, NCMEC issued Cybertipline Report numbers 37033911 and 37033735 to the Maryland State Police. According to both Cybertipline Reports, Facebook reported to NCMEC that the following user enticed and paid another Facebook user, "James Lora," to produce and send images of child pornography via private message:

Name:	Patrick Wood
DOB:	3----1986 [redacted]
Email Address:	wood14225@gmail.com
Profile URL:	<a href="http://www.facebook.com/people/Patrick-Wood/100015943514412">http://www.facebook.com/people/Patrick-Wood/100015943514412</a>
IP Address:	2607:fb90:1774:8bfl:0000:002b:5153:c001 07-21-2018 22:21:14 UTC
Additional Information:	Estimated location on 7/22/2018 UTC: Aspen Hill, US (not verified) Email: wood14225@gmail.com (verified)

6. I have reviewed the images and videos sent from the Facebook account of "James Lora" to Facebook user "Patrick Wood" that were captured by Facebook and sent to NCMEC. The

majority of these images and videos contain child pornography as defined in Title 18, United States Code, Section 2256(8). One of the videos is described as follows:

a. **Axtovmr3cgsck0037336819\_146451689581495\_6089658413296386048\_n-**

a video file that depicts a nude prepubescent minor male standing while the camera focuses on the genitals of the minor. The minor is manipulating his genitals with his hands. The minor is standing in a room with a table in the background with books stacked on the table.

7. On or about July 25, 2018, a subpoena was issued to Comcast for subscriber information based on the IP address used to access the Facebook account of “Patrick Wood,” listed in paragraph 5 above. On or about July 26, 2018, Comcast responded to the subpoena with the following subscriber information:

Subscriber Name:	Patrick Wood
Service Address:	14225 Pear Tree Lane, Apt. 23 Silver Spring, MD 20906
Subscriber Phone:	240-644-7834
Type of Service:	High Speed Internet
Account Status:	Active

8. The Cybertipline Reports record the following excerpts of communications that occurred on July 18, 2018 between 18:15:58 UTC and 18:21:13 UTC between the user of the “Patrick Wood” Facebook account and the user of the “James Lora” Facebook account. The communication below is exactly what was provided by NCMEC in the Cybertipline Report:

Lora: You sent

Wood: Send me video of him playing with his dick or her playing with pussy

Lora: The baby boy I can wake up and playing his dick I sent you the video

Lora: This image was uploaded

Lora: I sent the video

Lora: So sent now 1000 php

Lora: pkianjeff@yahoo.com

This communication was sent immediately preceding and following the uploading of a video, described as:

a. **ak8y6c6bc944sw4837316142 146786712881326 8513745690394886144 n.**

**mp4** – a video file that depicts a partially nude prepubescent minor male his genitals are exposed in the video and he is manipulating his genitals with his hands. His pants and underwear are pulled down in the video and his underwear which is red in color are visible in the video. The minor is also simulating masturbating in the video. The video is 34 seconds in length.

9. The Cybertipline Reports record the following communications on or about July 19, 2018, between 05:01:24 UTC and 05:06:21 UTC, between the Facebook user “Patrick Wood” and the Facebook user “James Lora:”

Lora: Wait I ask her she prepare now to go the trip

Wood: Can she open it for me

Lora uploaded image:

a. **15x63fue6e8k8g437500278 146975346195796 4295336285230333952 n.i**

**pg** – an image file that depicts a nude prepubescent minor female with legs spread to expose her genitals in the image. The image is a close up of the genitals and only a portion of the minor’s thighs and midsection are visible in the image.

Wood: can she open like she did no cam

Wood: if I come there can I fuck her

Lora: She go to trip 1:05pm she late later if she got home

10. On July 27, 2018, a state search warrant was executed at 14225 Pear Tree Lane, Apt. 23, Silver Spring, MD 20906.

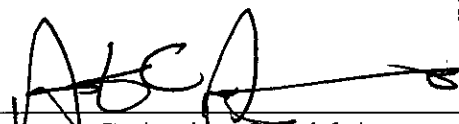
11. WOOD was present in the residence. Agents seized several items, to include an Acer Chromebook, model N15Q9, bearing serial number NXGHJAA00272508A6F7600. An on-scene preview of the Acer Chromebook revealed images that constitute child pornography, located in the "downloads" folder. The following is an example of one of the images:

a. 31232073 1514936361969184 597497411 o.jpg – an image that depicts an adult hand pulling the yellow pants down of a prepubescent male and exposing his genitals to the camera.

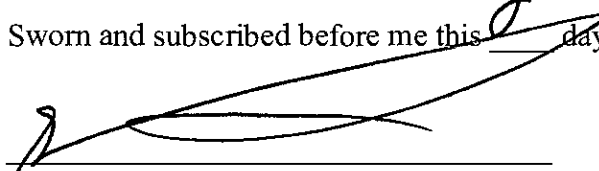
### CONCLUSION

12. Based on the above described information, I submit that there is probable cause to believe that **PATRICK LAWRENCE WOOD** violated Title 18, United States Code, Section 2251(a) (Production of Child Pornography), Section 2252A(a)(2) (Receipt of Child Pornography), and Section 2252A(a)(5)(B) (Possession of Child Pornography).

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief:

  
Augustus C. Aquino, Special Agent  
Homeland Security Investigations (HSI)

Sworn and subscribed before me this 2<sup>nd</sup> day of August, 2018.

  
Hon. Gina L. Simms  
United States Magistrate Judge